

Philip D. Anker (PA 7833)
Melanie J. Dritz (MD 7825)
WILMER CUTLER PICKERING
HALE AND DORR LLP
399 Park Avenue
New York, New York 10022
Telephone: (212) 230-8800
Facsimile: (212) 230-8888

Dennis L. Jenkins
WILMER CUTLER PICKERING
HALE AND DORR LLP
60 State Street
Boston, Massachusetts 02109
Telephone: (617) 526-6000
Facsimile: (617) 526-5000

Attorneys for Pension Benefit Guaranty Corporation

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----	X	
	:	
In re:	:	
	:	Chapter 11
	:	
GENERAL MOTORS CORPORATION, <i>et al.</i> ,	:	Case No. 09-50026 (REG)
	:	
Debtors.	:	
	:	
-----	X	

**NOTICE OF APPEARANCE
AND REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that Wilmer Cutler Pickering Hale and Dorr LLP, counsel for Pension Benefit Guaranty Corporation (“PBGC”), files this Notice of Appearance and Request for Service of Papers, pursuant to Rules 2002, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Sections 102(1), 342 and 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”), and requests that copies of all notices and pleadings given or required to be given in this case, be given to and served upon:

Philip D. Anker, Esq.
Melanie J. Dritz, Esq.
Wilmer Cutler Pickering Hale and Dorr LLP
399 Park Avenue
New York, New York 10022
Telephone: (212) 230-8800
Facsimile: (212) 230-8888
E-mails: philip.anker@wilmerhale.com
melanie.dritz@wilmerhale.com

- and -

Dennis L. Jenkins
Wilmer Cutler Pickering Hale and Dorr LLP
60 State Street
Boston, Massachusetts 02109
Telephone: (617) 526-6000
Facsimile: (617) 526-5000
E-mail: dennis.jenkins@wilmerhale.com

PLEASE TAKE FURTHER NOTICE that, pursuant to Rules 2002 and 9010(b) of the Bankruptcy Rules, and section 1109(b) of the Bankruptcy Code, the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, all orders, notices, hearing dates, applications, motions, petitions, pleadings, requests, complaints, demands, replies, answers, schedules of assets and liabilities, statements of affairs, operating reports, plans of reorganization, and disclosure statements, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, hand delivery, telephone, facsimile, telecopy or otherwise filed with regard to this case and any proceedings thereon.

This Notice of Appearance and Request for Service of Papers shall not be deemed or construed to be a waiver of (A) the rights of PBGC (i) to have final orders in non-core matters entered only after de novo review by a District Judge, (ii) to trial by jury in any proceeding so triable in these cases or in any case, controversy, or proceeding related to these cases, and (iii) to

have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (B) any other rights, claims, actions, setoffs, or recoupments to which PBGC are or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments PBGC expressly reserve.

Date: New York, New York
June 2, 2009

/s/ Philip D. Anker
WILMER CUTLER PICKERING
HALE AND DORR LLP
Philip D. Anker (PA 7833)
Melanie J. Dritz (MD 7825)
399 Park Avenue
New York, New York 10022
Telephone: (212) 230-8800
Facsimile: (212) 230-8888

- and -

Dennis L. Jenkins
60 State Street
Boston, Massachusetts 02109
Telephone: (617) 526-6000
Facsimile: (617) 526-5000

*Attorneys for Pension Benefit Guaranty
Corporation*